FACT SHEET

as required by LAC 33:IX.3109 for major LPDES facilities, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0044695; AI 19319; PER20070001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. THE APPLICANT IS: City of Ponchatoula
City of Ponchatoula Wastewater Treatment Facility
125 W. Hickory Street
Ponchatoula, LA 70454

II. PREPARED BY: Angela Marse

DATE PREPARED: September 7, 2007

III. PERMIT ACTION: LPDES permit LA0044695, AI19319

LPDES application received: March 1, 2007

LPDES permit issued: January 1, 2002
LPDES permit expired: December 31, 2007

IV. FACILITY INFORMATION:

A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the City of Ponchatoula.

B. The permit application and recommendation from LDEQ Pretreatment personnel does indicate the receipt of industrial wastewater.

C. The facility is located on La. Hwy. 51 in Ponchatoula, Tangipahoa Parish.

D. The treatment facility consists of an aerated lagoon, followed by a Lemna pond. Disinfection is by chlorination.

E. Outfall 001

Discharge Location: Latitude 30° 24' 47" North
Longitude 90° 25' 48" West

Description: treated sanitary wastewater

Design Capacity: 1.4 MGD

Type of Flow Measurement which the facility is currently using:

Combination Totalizing Meter / Continuous Recorder

V. RECEIVING WATERS:

The discharge is into unnamed ditch, thence into South Slough, thence into Anderson Canal, thence into Lake Pontchartrain in segment 040604 of the Lake Pontchartrain Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The **critical low flow** (7Q10) of the receiving waterbody is 0.1cfs.

The **hardness value** is 29.5mg/l and the **fifteenth percentile value for TSS** is 8.7mg/l.

The designated uses and degree of support for Segment 040604 of the Lake Pontchartrain Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment	Degree of Support of Each Use						
Insufficient Data	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Insufficient Data	Insufficient Data	Insufficient Data	N/A	N/A	N/A	N/A

[1/] The designated uses and degree of support for Segment 040604 of the Lake Pontchartrain Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 040604 of the Lake Pontchartrain Basin, is listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish & Wildlife Service (FWS) as habitat for the *Gulf Sturgeon*, which is listed as an endangered species. LDEQ, as instructed by the FWLS in a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ), has sent this draft permit to the FWLS for review and consultation.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the fact sheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:
Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mrs. Angela Marse
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Interim Effluent Limits:

OUTFALL 001

Effluent limitations for conventional parameters in the proposed permit are the same as in the previous permit with the exception of the loading limits. Loading limits have increased due to an increase in design capacity. Design capacity increased when the facility was rebuilt as a result of damage from Hurricane Katrina.

Subsegment 040604 is not on the 303(d) List of impaired waterbodies nor has any TMDL or other study determined the need for more stringent effluent limitations at this time. Nonetheless, a reopener clause has been included in the permit. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions as a result of a change in waterbody status or any subsequent water quality study.

Interim effluent limits shall become effective on the effective date of the permit and expire three years from the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD_5	117	10 mg/l	15 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this type and size.
TSS	175	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
Dissolved Oxygen**	N/A	5 mg/l	N/A	Limit is established through BPJ in accordance with the previous permit and rationale for LWDPS Permit WP1847 issued November, 1989.

**This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

Priority Pollutants

The previous permit contained a water quality based limit for Lead. As per LAC 33:IX.2707.L.2a.ii availability of information which was not available at the time of previous permit issuance and will justify the application of less stringent limits in the proposed permit constitutes an exception to LAC 33:IX.2707.L.1 which state when a permit is renewed or reissued standards or conditions must be at least as stringent as the final limitations, standards, or conditions in the previous permit.

The previous permit required a water quality based limit of 0.041mg/l monthly average for Lead. Analytical data from February, 2006 through October, 20006 and the effluent analysis submitted with the application did not indicate the presence of lead in the effluent. Therefore, the limit for lead it has been removed from the proposed permit.

Effluent analysis submitted with the application determined the need for an effluent limit for Chlordane. During the draft comment period, the permittee may submit the results of three (3) or more additional effluent analyses taken no less than 48 hours apart to either refute or substantiate the presence of chlordane. Prior to finalization of this permit, the additional analyses will be evaluated by this Office to determine if the pollutant is potentially in the effluent and if it exceeds the State's water quality standards. If a water quality based limit is needed in the final permit, an interim period is proposed to allow the permittee time to comply with the limit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Daily Max. (lbs/day)	Basis
Chlordane	Report	Report	A Water Quality Screen indicated the need for a Water Quality Based Limit. For monitoring and data gathering purposes, report is proposed in the interim period.

Other Effluent Limitations:

1) **Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgment in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.
The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.)

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

Toxicity Characteristics

Based on information contained in the permit application, LDEQ has determined there may be pollutants present in the effluent which may have the potential to cause toxic conditions in the receiving stream in violation of Section 101(a)(3) of the Clean Water Act. The State has established a narrative criteria which, in part, states that 'No substances shall be present in the waters of the State or the sediments underlying said waters in quantities alone or in combination will be toxic to human, plant, or animal life ...' (LAC 33:IX.1113.B.5).

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are listed on the following page.

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No LA0044695 **Section E** for the organisms indicated below.

TOXICITY TESTS	FREQUENCY
Chronic static renewal 7-day survival & reproduction test using Ceriodaphnia dubia (Method 1002.0)	1/quarter
Chronic static renewal 7-day survival & growth test using fathead minnow (Pimephales promelas) (Method 1000.0)	1/quarter

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 30%, 40%, 54 %, 72%, and 96%. The low-flow effluent concentration (critical low-flow dilution) is defined as 96% effluent. The critical dilution is calculated in Appendix B-1 of this fact sheet. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section E** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section E** of the permit.

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective three years from the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD_5	117	10 mg/l	15 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this type and size.
TSS	175	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
Dissolved Oxygen**	N/A	5 mg/l	N/A	Limit is established through BPJ in accordance with the previous permit and rationale for LWDPS Permit WP1847 issued November, 1989.

**This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

Priority Pollutants

Effluent Characteristic	Monthly Avg. (lbs./day)	Daily Max. (lbs/day)	Basis
Chlordane	2.32×10^{-6}	5.52×10^{-6}	A Water Quality Screen indicated the need for a Water Quality Based Limit.

Other Effluent Limitations:

1) **Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgment in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.
The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.)

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

Toxicity Characteristics

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No LA0044695 **Section E** for the organisms indicated below.

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Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 30%, 40%, 54 %, 72%, and 96%. The low-flow effluent concentration (critical low-flow dilution) is defined as 96% effluent. The critical dilution is calculated in Appendix B-1 of this fact sheet. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section E** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section E** of the permit.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0044695: Issued: January 1, 2002
Expired: December 31, 2007

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Daily Avg.	Daily Max.	Measurement Frequency	Sample Type
Flow	Report	Report	Continuous	Recorder
BOD_5	10 mg/l	15 mg/l	2/week	6-hr composite
TSS	15 mg/l	23 mg/l	2/week	6-hr composite
Dissolved oxygen	5 mg/l	N/A	2/week	Grab
Fecal Coliform Colonies	200	400	2/week	Grab
pH	---	---	2/week	Grab
Total Lead	0.041 lb/day	0.097 lb/day	1/month	24-hr composite

The permit contains pretreatment language.
The permit contains biomonitoring.
The permit contains pollution prevention language.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following most recent inspection was performed for this facility.

Date – June 22, 2006
Inspector - LDEQ
Findings and/or Violations -

1. The inspection report summarized damage and excursions suffered from Hurricane Katrina.
2. The system came back on-line in May, 2006. Although the new aeration system was installed, but the City is still working out some DO ad TSS problems.
3. Paperwork was on-site. LDEQ personnel recommended the operator put a thermometer in the refrigerator.
4. Discharge was clear with a slight greenish tint.
5. Facility looked well maintained.

B) Compliance and/or Administrative Orders

A review of the files indicates the following most recent enforcement actions administered against this facility:

LDEQ Issuance:

Docket # - WE-C-06-5400A
Date Issued – September 25, 2006
Findings of Fact:

1. The facility suffered significant damage due to Hurricane Katrina. Specifically; levees were eroded, aeration system and duckweed barrier were ripped from the levees, baffle curtain were torn and located at the south end of the facility, and power was lost.
2. Several months of permit noncompliance followed.

Order:

1. The permittee was given a schedule to repair damage and comply with permit limits.
2. The permittee was ordered to submit progress reports within 15 days of each due date specified in the schedule.

*As of a letter dated January 30, 2007 from the City of Ponchatoula, they are still working on compliance problems. The letter indicated their need for additional aeration and outlined a schedule to obtain it.

C) **DMR Review**

A review of the discharge monitoring reports for the period beginning May, 2005 through March, 2007 has revealed the following violations:

Effluent Characteristic	Number of Violations
BOD_5 - (concentration)	39 (average and max)
TSS - (concentration)	15 (average and max)
Fecal Coliform	5 (average and max)
Dissolved oxygen	9

XII. ADDITIONAL INFORMATION:

PERMIT REOPENER CLAUSE

In accordance with LAC 33:IX.2361.C.3, this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(c) and (D); 304(b)(2); and 307(a)(2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

a) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or

b) Controls any pollutant not limited in the permit; or

c) Require reassessment due to change in 303(d) status of waterbody; or

d) Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

Please be aware that the Department will be conducting a TMDL in the Lake Ponchartrain Basin scheduled for completion in 2011. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions as a result of the TMDL. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

In order for the permittee to comply with permit limits required for chlordane, a compliance schedule is proposed. The permittee shall achieve compliance with the INTERIM AND FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS as specified in accordance with the following schedule:

ACTIVITY	DATE
Achieve Interim Effluent Limits and Monitoring Requirements	Effective Date of the Permit
Achieve Final Effluent Limitations and Monitoring Requirements	Three years from the effective date of the permit.

During the draft comment period, the permittee may submit the results of three (3) or more additional effluent analyses taken no less than 48 hours apart to refute or substantiate the presence of this pollutant. Prior to finalization of this permit, the additional analyses will be evaluated by this Office to determine if the pollutant is potentially in the effluent and if it exceeds the State's water quality standards.

If a compliance schedule and a chlordane limit are included in the final permit, the permittee shall submit an annual progress report detailing activities to achieve compliance with final effluent limitations. Within 14 days of completion of construction of the new outfall, the permittee shall notify the Department of Environmental Quality, Office of Environmental Compliance, Permit Compliance Unit, in writing, that construction has been completed.

STORMWATER POLLUTION PREVENTION PLAN

The requirements of Part II, Section D apply to stormwater discharges associated with industrial activity as defined at LAC 33:IX.2511.B.14.i and Sector T of the LDPES Multi-Sector Stormwater Permit LAR5000. These requirements apply to point source stormwater discharges associated with domestic sewage treatment works with a design flow of 1.0 MGD or more. The City of Ponchatoula, Ponchatoula Wastewater Treatment Plant design capacity is 1.4 MGD. Therefore, the City of Ponchatoula will also be required to develop a Stormwater Pollution Prevention Plan to be effective six months from the effective date of the permit.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 1.4 MGD.

Effluent loadings are calculated using the following example:

BOD: 8.34 gal/lb x 1.4 MGD x 10 mg/l = 117lb/day

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows with this flow.

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, pretreatment language has been included in the permit. This language requires the POTW to begin developing an approved pretreatment program and submit a list of updated industrial user surveys, including qualitative analysis of the industrial user's wastewater.

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards", Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program", Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, City of Ponchatoula,City of Ponchatoula Wastewater Treatment Facility, March 2, 2007.